

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**TONYA CLAY, et al.,**

Plaintiffs,

-vs-

**CUYAHOGA COUNTY, et al.,**

Defendants.

**Case No. 1:18 CV 2929**

**Judge Solomon Oliver, Jr.**

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**JOINT STATUS REPORT CONCERNING SETTLEMENT NEGOTIATIONS PROCESS**

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Plaintiffs and the Cuyahoga County Defendants (“Parties”)<sup>1</sup> have yet to reach a final settlement but are currently working on a proposed agreement. The parties intend to resolve this matter through a private settlement, rather than by consent decree. But there are several issues still under negotiation.

The Parties received a detailed and comprehensive report from their joint expert in mid-July 2022. Since receipt of this report, the County has taken steps to implement or address some of the Joint Expert’s recommendations. The Parties, however, are working on a plan to address the remaining recommendations raised in the report and intend to develop a plan with benchmarks and timelines for addressing them.

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<sup>1</sup> The MetroHealth System is also a party to this case, but the Joint Expert’s Report focuses on the correctional, rather than medical, operations of the jail.

Though this process has taken longer than anticipated, the Parties remain committed to working cooperatively towards a resolution. It is the Parties' intent to have a settlement agreement in place by November 15, 2022. The Parties will update the Court if there are issues or the Parties have reached an impasse on their negotiations. So far, the Parties do not anticipate any problems.

Accordingly, the Parties respectfully ask this Court to continue to hold this case in abeyance, pending the Parties' ongoing efforts toward potential resolution. The Parties will update the Court on or before October 31, 2022, as to the settlement status.

Respectfully submitted,

/s/Jacqueline Greene

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